

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

COHN LIFLAND PEARLMAN
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Our File: 39,574-0

In Re:

MAUREEN A. DEVINE,

Debtor.

Case No. 17-16939 (RG)

Chapter 13

Judge: Rosemary Gambardella

**OPPOSITION TO TRUSTEE'S
CERTIFICATION OF DEFAULT**

JEFFREY W. HERRMANN does hereby certify and say that:

1. I am a member of the firm Cohn Lifland Pearlman Herrmann & Knopf LLP, attorneys for Debtor, Maureen Devine.
2. I make this Certification in opposition to the Trustee's Certification of Default filed on October 16, 2017.
3. Debtor has been working in good faith to sell her property located at 296 Pequest Road, Andover, New Jersey (the "Property").
4. Debtor listed the Property July 5, 2017 with Harford Real estate. Since that date, Debtor has reduced the price of the listing three times (on or around August 16, 2017, September 22,

2017 and October 5, 2017) by a total of \$80,000. Attached as **Exhibit "A"** is the MLS listing showing that the listing price on the property is currently \$299,000 as of October 5, 2017.

5. There is only one lien holder on the Property, U.S. Bank Trust ("U.S. Bank"). U.S. Bank filed a Proof of Claim on August 14, 2017 [claim no. 10] with an amendment on September 21, 2017, indicating a balance due of \$227,754.82. The proof of claim does not list a value for the Property.

6. The Property consists of a three bedroom, two bath contemporary house on almost 10 acres of land.

7. Debtor believes that the value of the property exceeds the amount owed to U.S. Bank and closing costs.

8. For this reason Debtor requests an additional 90 days to sell the property.

9. Once an offer is tendered, it will be presented to the Court for approval on notice to all interested parties.

10. I certify under penalty of perjury that the foregoing is true and correct.

DATED: October 24, 2017

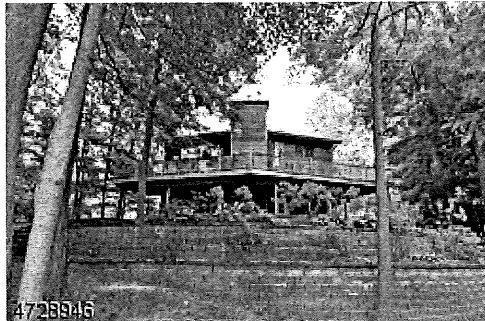
/s/Jeffrey W. Herrmann
JEFFREY W. HERRMANN

EXHIBIT “A”

10/5/2017

Sussex* Green Twp.* (2808)

Residential Client Full Report



			List Price: \$299,900
MLS#:	3401822	Section:	LP: \$299,900
Status:	Active	ZN:	OLP: \$379,900
Rms:	8	GRS:	SP: GREEN HLS
Bdrm:	3	MSJR:	LD: 07/05/2017
FB:	2	HS:	UCD:
HB:	0	Acres:	CD:
ZIP:	07821-2116*	LtSz:	ADM: 91
RZIP:		SqFt:	DOM: 92
Block:	24*	CLR:	SDA:
Lot:	5*	CL:	No
Unit #:		GSMLS.com:	Yes
Floor #:		YB/Desc/Ren:	2000 / Approximate /
Bldg #:		PSubType:	SinglFam
FHA55+:	No	Style:	Contemporary
Pets:			

Directions: Route 206 to Brighton Road to Pequest Road to # 296**Remarks:** A Wildlife Lover's Paradise! This 3 bed, 2 bath contemporary home with cedar siding is truly a home among nature set upon almost 10 acres and encompasses a large part of Turtle Pond. The main living and dining room areas have high ceilings with lots of windows. From the main living area, step out onto the large deck that lines 3 sides of the house. Walkout from the basement onto the large paver patio with stairs to the trail that goes right to Turtle Pond, the wildlife and the boat ramp, where you can launch a paddle boat, row boat or canoe. On the way, stop along the campfire site and watch the sunset. This home has plenty of storage space both inside and out. Use the outdoor wood burning boiler on those chilly nights as a secondary source of heat. Come and see natural beauty at it's best.

INTERIOR

Applns: Cooktop-Gas, Dishwasher**Bsmnt:** Yes / Finished, Walkout**Dine:** Living/Dining Combo**Exclu:** Refrigerators, Washer/Dryer, Garage Door Openers, Microwave**FirePl:** 1 / Gas Fireplace, Living Room**Floor:** Carpeting, Tile**Handicap Modified:****IntFeat:** High Ceilings, Jetted Tub, Skylight**Kitch:** Not Eat-In Kitchen**MastBr:****MstBath:****P-Use:****In-law Suite:** No/

EXTERIOR / OTHER FEATURES

Amnt:**Drive:** 6 / 2 Car Width, Additional Parking**Exterior:** CedarSiding**ExtFeat:** Deck, Dock, Outbuilding(s), Patio, Storage Shed**Garage:** 2 / Attached Garage**LotDesc:** Pond On Lot**Pool:** No/**Roof:** Asphalt Shingle

ROOM DIMENSIONS

LivRm: / First**DinRm:** / First**Kitch:** / First**Den:** /**FamRm:** /**Mstr:** / Second**Bed2:** / Second**Bed3:** / Basement**Bed4:** /**Rec Room:** /Basement**Laundry Room:** /First**Den:** /Basement**Storage Room:** /Basement**LevelB:** 1 Bedroom, Den, Rec Room, Storage Room, Utility Room**LevelG:****Level1:** Bath(s) Other, Dining Room, Kitchen, Laundry Room, Living Room**Level2:** 2 Bedrooms, Bath Main**Level3:****OthLev:****Attic:**

UTILITIES

Heat: Baseboard - Hotwater**Sewer:** Septic**Cool:** Central Air**Utilities:** Gas-Propane**Fuel:** Gas-PropaneLeased, OilTankAboveGround-Inside, Wood**Water:** Well**Service:****WtrHt:**

FINANCIAL INFORMATION / TAX INFORMATION

Taxes: \$10,476 / 2016**TaxRt:** 3.469 / 2016**BldAsmt:** \$176,600**LndAsmt:** \$125,400**TotAsmt:** \$302,000**Fee:** \$ /**AppFee:** \$**FarmAsm:** No**HmWrnty:****OTP:** Fee Simple**Other:** \$ /**FeeIncl:**

Info. deemed RELIABLE but not GUARANTEED - ALL Room Sizes are Approx.

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SHANNON HARFORD